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Attorneys for Ricoh Company, Ltd.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Plaintiff,

vs.

AEROFLEX INC., et al.

Defendants.

) Case No. C03-4669 MJJ (EMC)
) Case No. C03-2289 MJJ (EMC)

) **DECLARATION OF MICHAEL A.**
) **WEINSTEIN IN SUPPORT OF**
) **ADMINISTRATIVE MOTION FOR A**
) **SEALING ORDER**

SYNOPSIS.,

Plaintiff,

vs.

RICOH COMPANY, LTD.
 Defendant.

1 Michael A. Weinstein declares as follows:

2 1. My name is Michael A. Weinstein, an attorney with the law firm of Dickstein, Shapiro,
3 Morin & Oshinsky, LLP, counsel for Ricoh Company Limited. I am over the age of 21 and am
4 competent to make this declaration. Based on my personal knowledge and information, I hereby declare
5 to all the facts in this declaration.

6 2. In case C03-4669, a Stipulated Protect Order ("Order1") was entered into on June 3, 2003
7 between the parties.

8 3. In case C03-2289, a Stipulated Protect Order ("Order2") was entered into on March 24,
9 2004 between the parties.

10 4. On June 8, 2006, counsel for Synopsys/Aeroflex et al. filed with the court a Notice of
11 Motion and Motion to Compel Discovery, and a declaration with numerous exhibits in support of
12 Motion to Compel Discovery, including a number of Ricoh's confidential discovery responses clearly
13 marked "CONFIDENTIAL."

14 5. Ricoh Company, Ltd. requests permission to file under seal the following documents and
15 exhibits which are designated confidential as defined in both Order1 and Order2.

16 a. Exhibits 3, 17, 27, 28, 29, 33, 34, 35, 36, 37, 38, 39, 41, 42, 47, 48, 49, and 53.

17 6. On June 8, 2006, counsel for Synopsys/Aeroflex et al. filed with the court
18 "Administrative Motion for a Sealing Order" requesting certain exhibits be filed under seal.

19 7. It is believed that the identified documents of 5a, *supra*, are privileged or protectable as a
20 trade secret or otherwise entitled to protection.

21 8. As such, the above identified exhibits should be filed under seal pursuant to Order1 and
22 Order2.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

25 Signed at Washington, D.C. on June 14, 2006.

26
27 June 14, 2006

28 /s/ Michael A. Weinstein
Michael A. Weinstein

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RICOH COMPANY, LTD.,

Plaintiff,

vs.

AEROFLEX ET AL,

Defendants.

CASE NO. CV 03-4669 MJJ (EMC)
CASE NO. CV 03-2289 MJJ (EMC)

**[PROPOSED] ORDER GRANTING
MISCELLANEOUS ADMINISTRATIVE
REQUEST TO FILE CERTAIN
DOCUMENTS AND EXHIBITS UNDER
SEAL**

SYNOPSYS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendants.

1 Counsel for Synopsys/Aeroflex et al. on June 8, 2006 have filed a Miscellaneous Administrative
2 Request pursuant to Civil Local Rules 7-11 and 79-5, and request permission to file under seal the
3 following Exhibits:

4 1. Exhibits 3, 17, 27, 28, 29, 33, 34, 35, 36, 37, 38, 39, 41, 42, 47, 48, 49, and 53.

5 Because the above documents include and refer to materials produced in discovery and
6 designated confidential by Ricoh Company, Ltd., this request was made pursuant to the Stipulated
7 Protective Order in this action.

8 The Court hereby GRANTS this request.

9 IT IS SO ORDERED.

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11 Dated: _____

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13 The Honorable Edward M. Chen
Magistrate Judge, United States District Court
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